

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OCLC, Inc.

Plaintiff,

v.

**ANNA'S ARCHIVE, f/k/a PIRATE
LIBRARY MIRROR, et al.,**

Defendants.

Case No. 2:24-cv-00144-MHW-EDP

Judge Michael H. Watson

**Magistrate Judge Elizabeth A.
Preston Deavers**

DECLARATION OF WILLIAM ROZEK

William Rozek declares the following pursuant to 28 U.S.C. § 1746:

1. My name is William Rozek. I am a resident of Dublin, Ohio and Brighton, Michigan.
2. I am the Chief Financial Officer and Treasurer of OCLC, Inc. ("OCLC"), a position I have held since September 2015. Prior to joining OCLC, I held financial leadership positions at a number of companies in a variety of fields, including electronic publishing and education, and I have previously served as the CFO of The Mars Agency, Budco, Inc., and ProQuest Information and Learning.
3. I received my Bachelor of Science in Accounting and Finance from the University of Michigan, and I am a Certified Public Accountant and a Chartered Global Management Accountant.
4. At OCLC, I am a member of OCLC's executive leadership team and am responsible for global accounting, budgeting, financial analysis, cash management, financial systems, pricing, external audit, lender relationships, insurance, and management of OCLC's investment portfolio.

5. I submit this declaration in support of OCLC's Motion for Default Judgment against defendant Anna's Archive. I am familiar with the facts set forth herein based on my work history and experience at OCLC, as well as my review of relevant OCLC records and publicly available information. On that basis, I believe the facts set forth herein to be true and correct.

Background on OCLC and WorldCat®

6. OCLC is an Ohio non-profit membership, computer library service and research organization dedicated to the public purposes of furthering access to the world's information and reducing the rate of the rise in library costs. OCLC provides shared technology services, original research, and community programs for its membership and the library community at large.

7. OCLC employs approximately 1,348 people in the United States, Canada, Europe, and Asia Pacific, 820 of which are based in Ohio.

8. OCLC supplies the infrastructure for libraries to collaborate, create, and share bibliographic records, thus providing efficiencies and lowering overall costs for record creation. More than 29,000 libraries in 122 countries and territories around the world have used OCLC services to locate, acquire, catalog, lend, preserve, and manage library materials.

9. OCLC's services to the library community include: Management Services, Metadata Services, Discovery and Reference Services, and Resource Sharing Services (collectively, "OCLC's Services").

10. At the core of OCLC's Services is WorldCat. WorldCat is the world's most comprehensive database of information about library collections and the authoritative source of library bibliographic records. It is a collection of OCLC member-contributed records, publisher records, and OCLC created records that give libraries a greater web-scale presence. The more

libraries that participate, the better and more useful WorldCat becomes to libraries, their end users, and other organizations that want to interact with libraries on the Web.

11. WorldCat contains more than 560 million bibliographic records, and it provides subscribers with access to 3.45 billion items from a variety of resources around the world. These records are high-quality.

12. The WorldCat database is a union of national and other union catalogs from around the world, as well as the closest approximation of a national union catalog of library holdings in the United States. This means that WorldCat is the fullest single source of worldwide library holdings available, access to which improves the efficiency with which items can be located in—and requested from—library collections.

13. OCLC also maintains and operates the world's largest library catalog website called WorldCat.org. WorldCat.org is a search engine that allows individuals to easily search the world's libraries by connecting thousands of library collections in one place.

14. To accomplish this, WorldCat.org allows individuals to search member libraries' catalogs as represented by their corresponding WorldCat records in the WorldCat database. When an individual views a search result from WorldCat.org, they see a more limited view of a WorldCat record, *i.e.*, with less information/metadata than is available for the record in the WorldCat database for cataloging purposes.

15. Most WorldCat data available in a WorldCat record is unavailable to an individual on WorldCat.org. This is because a full WorldCat record is part of a member library's subscription for cataloging and other library services.

16. WorldCat.org creates essential online visibility and traffic for libraries and their collections, which member libraries are willing to pay for as part of their WorldCat Discovery Services/FirstSearch subscription.

OCLC has Invested Decades and Billions of Dollars to Develop, Enhance, and Maintain WorldCat Records and WorldCat.org

17. Over the past 55 years, OCLC has made substantial investments, including approximately 68 million dollars over the past two years and 162 million dollars over the past five years, developing and enhancing its library bibliographic records and associated metadata that OCLC markets as WorldCat.

18. OCLC employs 235 employees (approximately 20% of its total workforce) whose job function is dedicated to the development, procurement, maintenance, improvement, and enhancement of OCLC WorldCat records.

19. WorldCat records are bibliographic data regarding the work, including, among other things, title, author, and number of pages, obtained from OCLC member libraries, publishers, vendors, and national libraries.

20. OCLC selects, arranges, and adds metadata to enhance these records to support discovery of, exploration of, and access to the records. This includes adding OCLC's own unique identifying number, the "OCN," which creates more effective queries and serves as an authoritative index for identifying and referring to specific titles or works. OCLC also adds Dewey Decimal Classification numbers and Faceted Application of Subject Terminology headings. OCLC has also designed record enhancements that recognize connections between works and then links and/or merges the records together. These additions further enrich the WorldCat records and support enhanced discovery.

21. Of the entire WorldCat collection, OCLC has modified, improved, and enhanced more than 93% of the records. The value of WorldCat are these modifications, improvements, and enhancements by OCLC.

22. WorldCat is one of OCLC's most financially important offerings, making up an average of 40% of OCLC's revenue over the past 5 years.

23. Customers must have a paid subscription to use WorldCat.

24. Over 14,600 libraries have subscriptions to use WorldCat ("WorldCat Customers"). Of all OCLC customers, approximately 50% are WorldCat Customers (collectively "OCLC Member Subscribers"). These WorldCat Customers are academic libraries (such as The Ohio State University), community colleges, public libraries (including the Columbus Metropolitan Library), state and government libraries (such as the Library of Congress), special libraries, and library consortia.

25. Even OCLC Member Subscribers that use non-OCLC services or platforms rely on WorldCat for their record cataloging needs.

26. WorldCat is not just important on its own. WorldCat is also integrated into almost all of OCLC's products and services provided to libraries and academic institutions. OCLC's cataloging, resource sharing, discovery, OCLC publisher, and OCLC data services all benefit from WorldCat records.

27. As a result of this integration throughout OCLC's other product and service offerings, WorldCat indirectly accounts for 83% of OCLC's revenue when looking at the impact on OCLC's Services and downstream products.

28. Not only is WorldCat data valuable to members, WorldCat is valuable to OCLC. WorldCat is integrated into and supports nearly all OCLC's other products and services, including WorldCat.org (albeit in a more limited format).

29. WorldCat.org supports over 3 million users per month.

30. OCLC has invested substantial resources into developing, maintaining, improving, and enhancing WorldCat.org. Over the past three years, OCLC has spent nearly \$6.8 million on WorldCat.org, improving WorldCat.org's features, user interface, search infrastructure, application infrastructure, networking, and more.

WorldCat.org Services Terms and Conditions

31. All individuals who use WorldCat.org agree to OCLC's WorldCat.org Services Terms and Conditions, which are publicly available online. The current Terms and Conditions were in effect during all times relevant in this case. When an individual searches on WorldCat.org, the individual agrees to the OCLC Terms and Conditions.

32. In the WorldCat.org Services Terms and Conditions, OCLC grants the individual a license to use WorldCat data available on WorldCat.org for a limited purpose, and in exchange, the individual agrees, among other limitations, not to use the data for commercial use; not to harvest "material amounts" of data; not to distribute, display, or disclose the data; and not to store the data.

Defendant Anna's Archive is a Well-Known Pirate Library Created and Promoted as A Free Way to Access Worldcat.Org Data

33. Created in July 2022, Anna's Archive, formerly known as Pirate Library Mirror ("PiLiMi"), is the "world's largest" illegal shadow or pirate library that holds itself out as a non-profit organization.

34. Shadow libraries, or pirate libraries, are online databases and/or search engines that allow their users to download copyrighted books, content, media, and other materials. These materials are offered without the consent of the content creators and/or owners.

35. Anna's Archive recognizes that it is a pirate library that engages in mass copyright infringement, as stated on its blog: "[w]e deliberately violate the copyright law in most countries." This blog post is located at <https://annas-blog.gs/blog-introducing.html>, and is attached here as Exhibit A.

36. While Anna's Archive describes its illegal enterprise as a "non- profit," it offers its users monthly subscriptions, which range from \$7 to \$100 a month and include a diversity of benefits depending on the subscription purchased. This subscription information is located at <https://annas-archive.gs/donate>, and is attached here as Exhibit B. In general, without a subscription, visitors of the website may still download pirated materials from third-party sources and torrent links for free.

37. Anna's Archive has touted on its website that it has allowed visitors to freely download pirated materials at a daily download rate of 374,000 items. This information is located at <https://annas-archive.gs/faq>, and is attached here as Exhibit C.

Anna's Archive Impermissibly Scraped, Harvested, and Distributed OCLC's Data

38. In the fall of 2022 and continuing throughout the following year, OCLC experienced cyberattacks on WorldCat.org from, at the time, an anonymous attacker. These attacks had a harmful effect on OCLC's servers, causing delay in not only WorldCat.org's speed and operations, but other OCLC products and services.

39. The anonymous attacker(s) accomplished these attacks through various means, including using bots (automated software applications) that “scraped” and harvested data from WorldCat.org and other WorldCat-based research sites.

40. Given WorldCat contains 1.4 billion OCNs, according to Anna’s Archive’s own claims, they are offering 97.4% of all WorldCat data for free. In the operators of Anna’s Archive own words—they are “giving it all away.”

41. Anna’s Archive also announced their torrents on its blog, X, Reddit, and other platforms, and encouraged users to download and analyze the data, creating a “mini-competition for data scientists.”

42. Anna’s Archive further thanked OCLC in its blog post that announced its hacking and scraping of OCLC’s WorldCat data for “the decades of hard work you put into building the collections that we now liberate. Truly: thank you”—acknowledging the value of the data.

43. Due to its widespread hacking and scraping activities, Anna’s Archive has been banned in Italy and the Netherlands. This information is located at <https://torrentfreak.com/silenzio-annas-archive-shadow-library-blocked-following-publishers-complaint-240104/> and <https://torrentfreak.com/dutch-court-orders-isp-to-block-annas-archive-and-libgen-240322/>, and are attached here as Exhibits D and E, respectively.

OCLC Incurred Costs and Suffered a Loss of Customer Goodwill as a Result of Anna’s Archive’s Impermissible Scraping of OCLC’s WorldCat Data

44. Anna’s Archive’s hacking attacks materially affected OCLC’s production systems and servers, requiring around-the-clock efforts from August 2022 to October 2023 to attempt to limit service outages and maintain the production systems’ performance for customers. Despite OCLC’s best efforts, customers still experienced many disruptions in paid services, requiring OCLC to create system workarounds to ensure services functioned.

45. OCLC was forced to divert existing personnel and resources from OCLC's other products and services to fight Anna's Archive's attacks. From August 2022 to October 2023, 34 full-time OCLC employees were diverted from their normal obligations and invested a combined 27,540 hours, including overtime, to defend against Anna's Archive's attacks. Under these demanding circumstances, these employees triaged issues as they arose, determining how to respond to each data harvesting activity while attempting to ensure that OCLC systems remained stable and available to customers.

46. Initially, the development team made code changes to respond to the harvesting attacks which was labor intensive and costly for OCLC. During this critical time, all other work scheduled for these employees was stopped until the attacks were mitigated or blocked.

47. After a period of assessment amid Anna's Archive's attacks, OCLC determined it was necessary to engage various companies, including Cloudflare, Inc., F5, Inc., and Aon, to assist in preventing the attacks and repairing OCLC's network infrastructure. OCLC purchased a Web Application Firewall from Cloudflare to block and manage the harvesting attacks. As the nature of the attacks morphed over time, the teams configuring and deploying Cloudflare were forced to reconfigure and re-deploy Cloudflare services in response to these pivoting attacks. These employees also performed development and monitoring activities to block the harvesting attacks. None of these activities were planned or considered within OCLC's normal operations.

48. These diversions of employee hours cost OCLC over \$2,754,000 from August 2022 to October 2023 to address continuing effects of the cyberattacks.

49. OCLC also purchased permanent Cloudflare services for the past two years for \$608,069. In addition, Aon was engaged to perform a penetration test on Worldcat.org and to

perform two forensic assessments at a cost of \$50,000, while F5's security services to OCLC cost \$172,302.

50. OCLC was also forced to maintain a 2-vendor network, using both Cisco and Arista, because OCLC employees were diverted from working on new product features or maintenance. This cost OCLC approximately \$200,000.

51. In all, it took OCLC half of a fiscal year to catch up to its normal schedule of upgrades, maintenance, and other program installations because of these attacks.

52. Separately, the diversion of employees resulted in productivity loss as resources were diverted away from planned work to respond to the harvesting attacks. As a result, OCLC's development and improvements to other products and services were delayed and limited impacting customer satisfaction.

53. For example, during this time, there were significant risks to OCLC's WorldCat Discovery, Find, Solr, Hadoop, and WMS products, as these products rely on WorldCat.org. The attacks on WorldCat.org caused significant harm to customer's perception of reliability for WorldShare Management Services and WorldCat Discovery.

54. To maintain service availability to OCLC customers during the cyberattacks, OCLC also had to purchase new hardware and install those items. This included 60 new physical servers, among other hardware items, which then had to be installed and tested, which took 900 hours. These purchases were required because the existing network and storage infrastructure was too small to process the exponential number of requests that were generated by the harvesting and scraping attacks. These unplanned and unbudgeted hardware expenditures cost OCLC \$1,548,693.

55. OCLC's customers were also affected by Anna's Archive's attacks. As noted above, customers experienced various product disruptions, and OCLC generally saw a loss of

customer good will with regard to its suite of products related to WorldCat.org. There were 68 incidents impacting all customers globally whose services depend on WorldCat during the period of attacks. Those incidents accounted for more than 560 hours of disrupted, degraded and unavailable services to OCLC members and patrons, based on OCLC's continuous monitoring of the harvesting activities and patterns it experienced at the hands of Anna's Archive.

56. OCLC Customer Service department consistently reported hundreds of customers being impacted with every incident. For instance, between August 2022 and October 2023, OCLC saw nearly 600 customer service tickets entered for complaints related to WorldCat Discovery, which was impacted by the scraping attacks. On October 26, 2022 alone, 134 tickets were opened because customers were seeing failed results for Discovery and WorldCat.org searches. These search errors and other performance problems reported by customers were a direct result of the barrage of attacks and scraping activity that overwhelmed OCLC's existing servers and technology infrastructure at the time.

57. Since October 2022, in total, OCLC has had to devote thousands of employee hours and \$5,333,064 to respond to and mitigate the harm from Anna's Archive's almost yearlong attack.

**The Current and Future Harm To OCLC From Anna's Archive's
Predatory Behavior Is Devastating**

58. On top of the costs incurred by OCLC, OCLC faces ongoing significant harm now that metadata representing 97.4% of all WorldCat records is available in the aggregate for public download. Competitors can download and analyze the data, as well as use the aggregate data for anti-competitive purposes. Moreover, current and future customers may download and copy the data, foregoing OCLC's Services, including WorldCat.

59. By creating a competition for the most unique use of OCLC's WorldCat data, Anna's Archive has all but ensured that individuals will download the data, use it for their own means, and incorporate it into other applications that facilitate its distribution.

60. Given WorldCat's importance to OCLC's operations and its other product/service offerings, the unlawful incorporation of OCLC's WorldCat records into Anna's Archive's free pirate library would damage OCLC's current and future customer base for WorldCat and decrease the value of WorldCat-dependent products by OCLC. The harm to OCLC is immediate and far-reaching because Anna's Archive has access to WorldCat data and can distribute it via their pirate library.

61. Anna's Archive's free distribution of WorldCat data harms OCLC's customer goodwill in a particularly unique way given how OCLC and WorldCat operate. Such distribution poses a vital threat to OCLC membership and participation in WorldCat generally. WorldCat is most valuable to its members when more libraries participate in it and catalog their records with OCLC because then more records are available through WorldCat. Any loss in OCLC membership and WorldCat participation has a direct, negative impact on members/customers that remain. Anna's Archive's distribution of WorldCat data for free will contract OCLC membership and WorldCat participation.

62. The continuation of Anna's Archive's unlawful distribution of OCLC's WorldCat records would also directly destroy OCLC's current and future customer good will for WorldCat specifically. WorldCat is one of OCLC's most financially important offerings.

63. WorldCat also sits at the center of OCLC's family of products and services as OCLC's cataloging, resource sharing, discovery, OCLC publisher, and OCLC data services all benefit from WorldCat records. OCLC's other products and services that have been affected by

Anna's Archive's cyberattacks on WorldCat include: WorldShare Management Services, WorldShare Metadata/OCLC Cataloging, Group Cataloging, WorldCat Discovery Services/First Search, WorldShare License Manager, WorldShare Collection Evaluation, WorldShare Interlibrary Loan, Tipasa, WorldCat.org, ILLiad, and GreenGlass.

64. Providing WorldCat records for free thus not only undermines the strength and value of WorldCat in the market, it also decreases its value to OCLC's other products and services, which further devalues OCLC's other products and services to current and potential customers. The negative impact of Anna's Archive's distribution of WorldCat records harms every aspect of OCLC's operations.

65. With Anna's Archive continuing to make OCLC's WorldCat records publicly available for free, current enrollment in WorldCat and other OCLC products and services will drop precipitously and future enrollment in these products and services will grind to a halt. OCLC currently employs 1,348 workers worldwide and 820 in Ohio. Of those workers, 20% of OCLC's total workforce is devoted the development, procurement, maintenance, improvement, and enhancement of OCLC WorldCat records. Given WorldCat's fiscal significance to OCLC, Anna's Archive's actions would also likely harm OCLC's workforce.

66. If allowed to continue unchecked, Anna's Archive's unauthorized use of WorldCat records will destroy OCLC's most important offering and cripple OCLC's ability to provide its other products and services. Ultimately, monetary damages will not adequately measure the damage to OCLC's customer goodwill and membership, the unknowable loss in sales of other products and services, or the long-term detrimental effect on the viability of WorldCat and OCLC's business, including its ability to compete, that might result from the loss of OCLC's most critical investment and source of revenue.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief Executed in Dublin, Ohio this 5th day of July, 2024.

William J Rozek

William Rozek

Exhibit A

Anna's Blog

Updates about Anna's Archive, the largest truly open library in human history.

Introducing the Pirate Library Mirror (EDIT: moved to Anna's Archive): Preserving 7TB of books (that are not in Libgen)

annas-archive.gs/blog, 2022-07-01

This project aims to contribute to the preservation and libration of human knowledge. We make our small and humble contribution, in the footsteps of the greats before us.

The focus of this project is illustrated by its name:

Pirate - We deliberately violate the copyright law in most countries. This allows us to do something that legal entities cannot do: making sure books are mirrored far and wide.

Library - Like most libraries, we focus primarily on written materials like books. We might expand into other types of media in the future.

Mirror - We are strictly a mirror of existing libraries. We focus on preservation, not on making books easily searchable and downloadable (access) or fostering a big community of people who contribute new books (sourcing).

The first library that we have mirrored is Z-Library. This is a popular (and illegal) library. They have taken the Library Genesis collection and made it easily searchable. On top of that, they have become very effective at soliciting new book contributions, by incentivizing contributing users with various perks. They currently do not contribute these new books back to Library Genesis. And unlike Library Genesis, they do not make their collection easily mirrorable, which prevents wide preservation. This is important to their business model, since they charge money for accessing their collection in bulk (more than 10 books per day).

We do not make moral judgements about charging money for bulk access to an illegal book collection. It is beyond a doubt that the Z-Library has been successful in expanding access to knowledge, and sourcing more books. We are simply here to do our part: ensuring the long-term preservation of this private collection.

We would like to invite you to help preserve and liberate human knowledge by downloading and seeding our torrents. See the project page for more information about how the data is organized.

We would also very much invite you to contribute your ideas for which collections to mirror next, and how to go about it. Together we can achieve much. This is but a small contribution among countless others. Thank you, for all that you do.

- Anna and the team ([Reddit](#))

We do not link to the files from this blog. Please find it yourself.

Exhibit B

✖ Update your bookmarks: annas-archive.org is no more, long live annas-archive.gs! 🚀 ✖

Anna's Archive

📖 The largest truly open library in human history. ⭐ We mirror Sci-Hub and LibGen. We scrape and open-source Z-Lib, DuXiu, and more. 📊 30,445,640 books, 100,357,126 papers — preserved forever. [Learn more...](#)

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Donate

Anna's Archive is a non-profit, open-source, open-data project. By donating and becoming a member, you support our operations and development. To all our members: thank you for keeping us going! ❤️ For more information, check out the [Donation FAQ](#).

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🐱 Exclusive Telegram with behind-the-scenes updates

🧙 Legendary status in preservation of humanity's knowledge and culture

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We're a small team of volunteers. It might take us 1-2 weeks to respond.

🚀 **Unlimited** high-speed access

⚡ Direct **SFTP** servers

Enterprise-level donation or exchange for new collections (e.g. new scans, OCR'ed datasets).

We welcome large donations from wealthy individuals or institutions. For donations over \$5000 please contact us directly at [Contact email](#). If you'd like to make a donation (any amount) without membership, feel free to use this Monero (XMR) address:

8C1Tdvhj6wHHPtvmHyAmn3jgt9vF9qSdKCYFy8U9ioB2Z16tEhjLSaB8qMSfzsnQeSrbohpyAiMgcW1acmmvCHQ4YGmZip.

Anna's Archive	Stay in touch	Advanced	Alternatives
Home	Contact email	FAQ	annas-archive.gs
Search	DMCA / copyright claims	Datasets	annas-archive.se
🔗 SciDB	Reddit / Telegram	Torrents	
FAQ	Anna's Blog ↗	Mirrors: call for volunteers	
Donate	Anna's Software ↗	LLM data	
🌐 English ▼	Translate ↗	Security	

Exhibit C

✖ Update your bookmarks: annas-archive.org is no more, long live annas-archive.gs! 🌈 ✖

Anna's Archive

📚 The largest truly open library in human history. ★ We mirror Sci-Hub and LibGen. We scrape and open-source Z-Lib, DuXiu, and more. 📊 30,445,640 books, 100,357,126 papers — preserved forever.

Learn more...

Recent downloads: :he power of women's anger • El valor de la atención • Cod. Pal. germ. 164 Heidelberger Sachsenspiegel Anfang 14.

FAQ

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Title, author, DOI, ISBN, MD5, ...

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Frequently Asked Questions (FAQ)

What is Anna's Archive?

Anna's Archive is a non-profit project with two goals:

1. **Preservation:** Backing up all knowledge and culture of humanity.
2. **Access:** Making this knowledge and culture available to anyone in the world.

All our [code](#) and [data](#) are completely open source.

Preservation

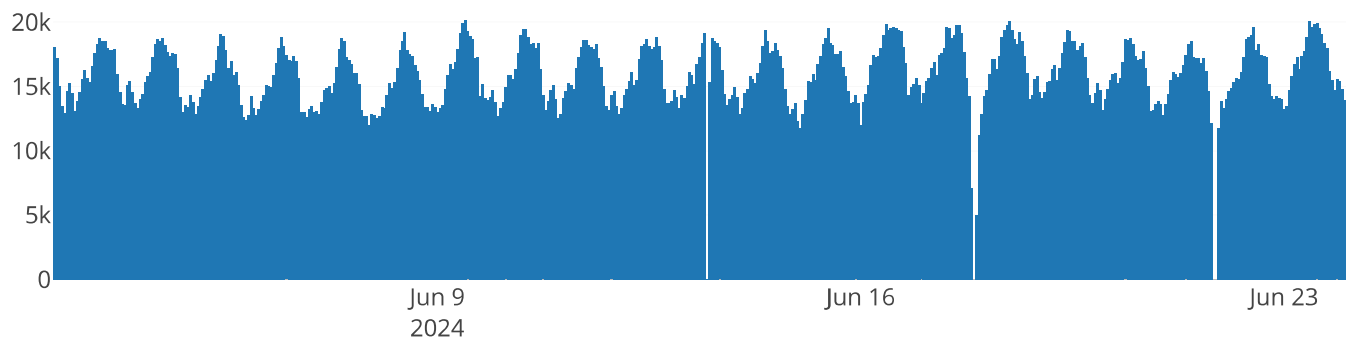
We preserve books, papers, comics, magazines, and more, by bringing these materials from various [shadow libraries](#), official libraries, and other collections together in one place. All this data is preserved forever by making it easy to duplicate it in bulk — using torrents — resulting in many copies around the world. Some shadow libraries already do this themselves (e.g. Sci-Hub, Library Genesis), while Anna's Archive “liberates” other libraries that don't offer bulk distribution (e.g. Z-Library) or aren't shadow libraries at all (e.g. Internet Archive, DuXiu).

This wide distribution, combined with open-source code, makes our website resilient to takedowns, and ensures the long-term preservation of humanity's knowledge and culture. Learn more about [our datasets](#).

└ We estimate that we have preserved about [5% of the world's books](#).

Access

We work with partners to make our collections easily and freely accessible to anyone. We believe that everyone has a right to the collective wisdom of humanity. And [not at the expense of authors](#).



Hourly downloads in the last 30 days. Hourly average: 16k. Daily average: 379k.

We strongly believe in the free flow of information, and preservation of knowledge and culture. With this search engine, we build on the shoulders of giants. We deeply respect the hard work of the people who have created the various shadow libraries, and we hope that this search engine will broaden their reach.

To stay updated on our progress, follow Anna on [Reddit](#) or [Telegram](#). For questions and feedback please contact Anna at [Contact email](#).

How can I help?

1. Follow us on [Reddit](#), or [Telegram](#).
2. Spread the word about Anna's Archive on Twitter, Reddit, Tiktok, Instagram, at your local cafe or library, or wherever you go! We don't believe in gatekeeping — if we get taken down we'll just pop right up elsewhere, since all our code and data is fully open source.
3. If you are able, consider [donating](#).
4. Help [translate](#) our website into different languages.
5. If you are a software engineer, consider contributing to our [open source](#), or seeding our [torrents](#).
6. If you are a security researcher, we can use your skills both for offense and defense. Check out our [Security](#) page.
7. We are looking for experts in payments for anonymous merchants. Can you help us add more convenient ways to donate? PayPal, WeChat, gift cards. If you know anyone, please contact us.
8. We are always looking for more server capacity.
9. You can help by reporting file issues, leaving comments, and creating lists right on this website. You can also help by [uploading more books](#), or fixing up file issues or formatting of existing books.
10. Create or help maintain the Wikipedia page for Anna's Archive in your language.
11. We are looking to place small, tasteful advertisements. If you'd like to advertise on Anna's Archive, please let us know.
12. We would love for people to set up [mirrors](#), and we will financially support this.

Why are the slow downloads so slow?

We literally do not have enough resources to give everyone in the world high-speed downloads, as much as we'd like to. If a rich benefactor would like to step up and provide this for us, that would be

incredible, but until then, we're trying our best. We're a non-profit project that can barely sustain itself through donations.

This is why we implemented two systems for free downloads, with our partners: shared servers with slow downloads, and slightly faster servers with a waitlist (to reduce the number of people downloading at the same time).

We also have [browser verification](#) for our slow downloads, because otherwise bots and scrapers will abuse them, making things even slower for legitimate users.

Donation FAQ

Do memberships automatically renew?

Memberships **do not** automatically renew. You can join for as long or short as you want.

Do you have other payment methods?

Currently not. A lot of people don't want archives like this to exist, so we have to be careful. If you can help us set up other (more convenient) payment methods safely, please get in touch at [Contact email](#).

What do you spend donations on?

100% is going to preserving and making accessible the world's knowledge and culture. Currently we spend it mostly on servers, storage, and bandwidth. No money is going to any team members personally.

Can I make a large donation?

That would be amazing! For donations over a few thousand dollars, please contact us directly at [Contact email](#).

Can I make a donation without becoming a member?

Sure thing. We accept donations of any amount on this Monero (XMR) address:

8C1Tdvhj6wHHPtvMHYAmn3jgt9vF9qSdKCYfy8U9ioB2Z16tEhjLSaB8qMSfzsnQeSrbohpyAiMgcW1acmmvCHQ4YGmZip

How do I upload new books?

For now, we suggest uploading new books to the Library Genesis forks. Here is a [handy guide](#). Note that both forks that we index on this website pull from this same upload system. If your email address doesn't work on the Libgen forums, we recommend using [Proton Mail](#) (free). You can also [manually request](#) for your account to be activated. Note that mhut.org blocks certain IP ranges, so a VPN might be required.

Alternatively, you can upload them to Z-Library [here](#).

To upload academic papers, please also (in addition to Library Genesis) upload to [STC Nexus](#). They are the best shadow library for new papers. We haven't integrated them yet, but we will at some point. You can use their [upload bot on Telegram](#), or contact the address listed in their pinned message if you have too many files to upload this way.

For large uploads (over 10,000 files) that don't get accepted by Libgen or Z-Library, please contact us at [Contact email](#).

How do I request books?

At this time, we cannot accomodate book requests. Please make your requests on Z-Library or Libgen forums. Do not email us your book requests.

Do you collect metadata?

We do indeed. Our inspiration for collecting metadata is Aaron Swartz' goal of "one web page for every book ever published", for which he created [Open Library](#). That project has done well, but our unique position allows us to get metadata that they can't. Another inspiration was our desire to know how many books there are in the world, so we can calculate how many books we still have left to save.

I downloaded 1984 by George Orwell, will the police come at my door?

Don't worry too much, there are many people downloading from websites linked to by us, and it's extremely rare to get into trouble. However, to stay safe we recommend using a VPN (paid), or [Tor](#) (free).

How do I save my search settings?

Select the settings you like, keep the search box empty, click "Search", and then bookmark the page using your browser's bookmark feature.

Do you have a mobile app?

We don't have an official mobile app, but you can install this website as an app.

Android: Click the three-dot menu in the top right, and select "Add to Home Screen".

iOS: Click the "Share" button at the bottom, and select "Add to Home Screen".

Do you have an API?

We have one stable JSON API for members, for getting a fast download URL:

/dyn/api/fast_download.json (documentation within JSON itself).

For other use cases, such as iterating through all our files, building custom search, and so on, we recommend [generating](#) or [downloading](#) our Elasticsearch and MariaDB databases. The raw data can be manually explored through JSON files such as [this](#).

Our raw torrents list can be downloaded as [JSON](#) as well.

Torrents FAQ

I would like to help seed, but I don't have much disk space.

Use the [torrent list generator](#) to generate a list of torrents that are most in need of torrenting, within your storage space limits.

The torrents are too slow, can I download the data directly from you?

Yes, see the [LLM data](#) page.

Can I download only a subset of the files, like only a particular language or topic?

Most torrents contain the files directly, which means that you can instruct torrent clients to only download the required files. To determine which files to download, you can [generate](#) our metadata, or [download](#) our ElasticSearch and MariaDB databases. Unfortunately, a number of torrent collections contain .zip or .tar files at the root, in which case you need to download the entire torrent before being able to select individual files.

How do you handle duplicates in the torrents?

We try to keep minimal duplication or overlap between the torrents in this list, but this can't always be achieved, and depends heavily on the policies of the source libraries. For libraries that put out their own torrents, it's out of our hands. For torrents released by Anna's Archive, we deduplicate only based on MD5 hash, which means that different versions of the same book don't get deduplicated.

Can I get the torrent list as JSON?

[Yes](#).

I don't see PDFs or EPUBs in the torrents, only binary files? What do I do?

These are actually PDFs and EPUBs, they just don't have an extension in many of our torrents. There are two places in which you can find the metadata for torrent files, including the file types/extensions:

1. Each collection or release has its own metadata. For example, [Libgen.rs torrents](#) have a corresponding metadata database hosted on the Libgen.rs website. We typically link to relevant metadata resources from each collection's [dataset page](#).
2. We recommend [generating](#) or [downloading](#) our ElasticSearch and MariaDB databases. These contains a mapping for each record in Anna's Archive to its corresponding torrent files (if available), under "torrent_paths" in the ElasticSearch JSON.

Do you have a responsible disclosure program?

We welcome security researchers to search for vulnerabilities in our systems. We are big proponents of responsible disclosure. Contact us [here](#).

We are currently unable to award bug bounties, except for vulnerabilities that have the potential to compromise our anonymity, for which we offer bounties in the \$10k-50k range. We'd like to offer wider scope for bug bounties in the future! Please note that social engineering attacks are out of scope.

If you are interested in offensive security, and want to help archive the world's knowledge and culture, be sure to contact us. There are many ways in which you can help.

Are there more resources about Anna's Archive?

- [Anna's Blog](#), [Reddit](#), [Subreddit](#) — regular updates

- [Anna's Software](#) — our open source code
- [Translate on Anna's Software](#) — our translation system
- [Datasets](#) — about the data
- [.gs, .se](#) — alternative domains
- [Wikipedia](#) — more about us (please help keep this page updated, or create one for your own language!)

How do I report copyright infringement?

We do not host any copyrighted materials here. We are a search engine, and as such only index metadata that is already publicly available. When downloading from these external sources, we would suggest to check the laws in your jurisdiction with respect to what is allowed. We are not responsible for content hosted by others.

If you have complaints about what you see on here, your best bet is to contact the original website. We regularly pull their changes into our database. If you really do think you have a valid DMCA complaint we should respond to, please fill out the [DMCA / Copyright claim form](#). We take your complaints seriously, and will get back to you as soon as possible.

I hate how you're running this project!

We would also like to remind everyone that all our code and data is completely open source. This is unique for projects like ours — we're not aware of any other project with a similarly massive catalog that is fully open source as well. We very much welcome anyone who thinks we run our project poorly to take our code and data and set up their own shadow library! We're not saying this out of spite or something — we genuinely think this would be awesome since it would raise the bar for everyone, and better preserve humanity's legacy.

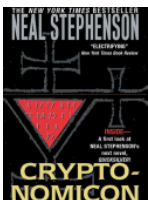
What are your favorite books?

Here are some books that carry special significance to the world of shadow libraries and digital preservation.



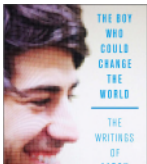
Against intellectual monopoly

Levine, David K, Boldrin, Michele



Cryptonomicon

Stephenson, Neal



The Boy Who Could Change the World: The Writings of Aaron Swartz

Aaron Swartz [Swartz, Aaron]



How Music Got Free

Witt, Stephen R



Физическая энциклопедия. Ааронова – Длинные Том 1

A. M. Прохоров

Anna’s Archive

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Alternatives

[annas-archive.gs](#)

[annas-archive.se](#)

Exhibit D

Silenzio! 'Anna's Archive' Shadow Library Blocked Following Publishers' Complaint

January 4, 2024 by **Andy Maxwell**

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Appearing in the wake of the Z-Library shutdown late 2022, shadow library 'Anna's Archive' now bills itself as the "largest truly open library in human history." A complaint filed in December 2023 by the Italian Publishers Association, which represents publishers of books, scientific journals, and digital content, paints a somewhat different picture. As a result, telecoms regulator AGCOM has issued immediate blocking instructions to ISPs.

Over the past decade, platforms including Sci-Hub, Libgen and Z-Library have broken through a sea of movie, TV show, music and similarly unlicensed platforms to take their own places on the piracy front lines.

In 2022, a platform called Pirate Library Mirror appeared on the scene, courting controversy right from the start after obtaining a full copy of Z-Library before the site's legal troubles began.

"We deliberately violate the copyright law in most countries. This allows us to do something that legal entities cannot do: making sure books are mirrored far and wide," the



team behind 'PiLiMi' wrote.

In November 2022, PiLiMi team member 'Anna Archivist' founded '[Anna's Archive](#)', a platform promising access to Z-Library and Libgen content from the same interface. Just over a year later, the site describes itself as the "largest truly open library in human history" mirroring Sci-Hub, Libgen, Z-Library, and other platforms, to offer 25.5 million books and 99.4 million papers for download.

90% of Italian Publishing Market Behind Complaint

Anna's Archive is a relative newcomer to the world of online shadow libraries, but its impact has already ensured the inevitable. In common with its counterparts who are already blocked by ISPs in several countries, a year after its launch Anna's Archive will receive the same treatment, starting in Italy.

On December 4, 2023, the Italian Publishers Association (AIE) filed a copyright complaint against Anna's Archive. Founded in 1869, AIE represents publishers of books, scientific journals, and digital content; together, these companies control 90% of the local market. AIE's complaint lists over 30 books, but the association stresses this represents just a sample of the content distributed by Anna's Archive to which its members hold the rights.

A sample of books listed in the complaint



https://annas-archive.org/md5/9ba4db85bb18e431c740d511cac72062	Access 2013 for dummies	HOEPLI	2013
https://annas-archive.org/md5/55cc1ace4ccb1662ffacceadfc1fe2c9	Japanese language course	HOEPLI	2007
https://annas-archive.org/md5/11ae75ad4dddf50ffc3615c00e454c1e	Introduction to Korean culture	HOEPLI	2018
https://annas-archive.org/md5/c51fc68cab0b4b9d17ab0c031a1e8454	Java Course	HOEPLI	2013
https://annas-archive.org/md5/942ceffdd2aa5e5a2d9942dd0d412605	Javascript. Complete developer's guide	HOEPLI	2016
https://annas-archive.org/md5/0ecc0952c6e5024b1c9e47cb750bc8d7	Yes I know... Pino Daniele between madness and blues	HOEPLI	2020
https://annas-archive.org/md5/12381063510eb6239f92d05a65755ab4	Diplomacy cultural and cold war	THE MILL	2020
https://annas-archive.org/md5/0060e5db70deb4dfc4dfbcdcb0471d58	Byzantium and the medieval West	THE MILL	2019
https://annas-archive.org/md5/68cd4134ab52eff78d164ce62c2d1bd1	Dominance and submission	THE MILL	2019
https://annas-archive.org/md5/dde751e7f34c368f4881ac7d04862c5a	Introduction to contemporary history	THE MILL	2020
https://annas-archive.org/md5/295f9e9f1aad92a451a050456f4001ae	Ties that hurt	THE MILL	2012
https://annas-archive.org/md5/016ab324ac9e2a0b22aa27c1df4e8669	Interpretation of cultures	THE MILL	2003
https://annas-archive.org/md5/a19b76b7570c1903c8fb77c348009cb3	Developmental neuropsychology	THE MILL	2017
https://annas-archive.org/md5/1535e2628234321cc3f0bd13bf3b54f1	Theaters. Italy's melodrama in the age of the Risorgimento.	THE MILL	2001
https://annas-archive.org/md5/be43139865ff859a18d983398fd34fb0	Strong mothers, wives weak	THE MILL	1995
https://annas-archive.org/md5/666d9cd00e7d1ee554f921edbdd7e67c	What a figure	THE MILL	2017
https://annas-archive.org/md5/f2b2215c025c3603c369c8c8318dfd56	Dracula, Plato, and Darwin. Mathematical games and reflections on the world	ZANICHELLI	2010
https://annas-archive.org/md5/532115159a76caa78a56113eb2fd1557	Systems and networks course for computer science	ZANICHELLI	2013
https://annas-archive.org/md5/b5ce4c4a75712ef91a39709251ebb474	Computer course for high schools	ZANICHELLI	2018

“The site annas-archive.org calls itself a mirror of various ‘shadow libraries’ and claims to have over 25 million books and nearly 100 million scholarly articles, which it makes available by disseminating numerous links to each work. Unauthorized reproductions of works belonging to Italian publishers number several thousand,” the complaint reads.

Investigation Led to Ukraine

An investigation by Italy’s Digital Services Directorate verified that the content listed in the complaint was actually accessible from Anna’s Archive. In view of the facts, that led investigators to believe that this was probably a case of “serious and massive infringement.”

Official papers indicate that the operator of Anna’s Archive proved “unidentifiable” but with assistance from Cloudflare, Epinatura LLC – a hosting provider in Kiev, Ukraine – was identified as the likely host of at least some of the platform’s servers. Notifications were sent to various service providers warning that “spontaneous compliance” with a blocking request filed by the publishers was a potential outcome.

Decision: Site Must Be Blocked

With no counterclaims received from the contacted parties and having determined mass infringement on the site, an order to disable <https://annas-archive.org> through a DNS block was issued to Italian ISPs, to be completed in 48 hours. Visitors to the site are now greeted by the blocking page below in Italian. (*translation on the right*)

AVVISO

L'accesso al presente sito è stato disabilitato in esecuzione di un provvedimento adottato dall'Autorità per le garanzie nelle comunicazioni, ai sensi del regolamento in materia di tutela del diritto d'autore online approvato con delibera n. 680/13/CONS.

Per maggiori informazioni visiti il sito www.agcom.it

NOTICE

Access to this site has been disabled in compliance with a provision adopted by the Communications Regulatory Authority, pursuant to the regulation on the protection of online copyright approved with resolution no. 680/13/CONS.

For further information visit the website www.agcom.it

While Anna's Archive operates alternative domains that aren't specifically mentioned in the order (annas-archive.gs, annas-archive.se), the site faces perpetual blocking measures against "all future domain names of the same site."

If the shadow library wishes to challenge the decision, it has until the middle of February to file a response before the Lazio Regional Administrative Court. At the moment, the site's operator has no plans to do so. Instead, they note that people have options to bypass these restrictions.

"We recommend people use VPNs or TOR (free!) to circumvent censorship," Anna tells us.

—

Update: added a comment from *Anna*.

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July 1, 2024, 18:24 by Andy Maxwell



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June 29, 2024, 12:21 by Andy Maxwell



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Exhibit E

Dutch Court Orders ISP to Block 'Anna's Archive' and 'LibGen'

March 22, 2024 by **Ernesto Van der Sar**

[HOME](#) > [ANTI-PIRACY](#) > [SITE BLOCKING](#) >

The Dutch pirate site blocklist has expanded with two new targets, shadow libraries Anna's Archive and Library Genesis. The court order was obtained by local anti-piracy group BREIN, acting on behalf of major publishers. Interestingly, Z-Library isn't listed in the blocking order, despite explicit warnings previously issued by BREIN.

Pirate site blocking is one of the entertainment industry's favorite enforcement tools. In recent years, it's become a common practice in many countries around the world.

In the Netherlands, it took over a decade for the first order to be approved. After detours through the Supreme Court and the EU Court of Justice, the final order was issued in 2020, [targeting The Pirate Bay](#).

With all the legal paperwork in order, the doors were open to more blocking requests, especially after rightsholders and local ISPs [signed a covenant](#) to streamline the process. If a court orders one company to block pirate sites, by agreement the other ISPs will follow suit.



After the initial Pirate Bay blockade, a follow-up order targeted YTS, EZTV and other torrent sites in 2022. Last year, Lookmovie and Flixtor were singled out in yet another case, despite a challenge to the 'dynamic' nature of these orders, which allows new domains to be added continuously.

Blocking Shadow Libraries

All blocking requests were submitted by local anti-piracy group BREIN, which acts on behalf of rightsholders. These include the major Hollywood studios but BREIN's purview is much broader. Last week, it obtained the latest blocking order, this time on behalf of the publishing industry.

Issued by the Rotterdam District Court, the order requires a local Internet provider to block two well-known shadow libraries; "Anna's Archive" and "Library Genesis" (LibGen).

News of this new court order was shared by BREIN which notes that both sites were found to make copyright infringing works available on a large scale. At the time of writing, a published copy is not available but, based on the covenant, all large Internet providers are expected to implement the blockades.

"These types of illegal shadow libraries are very harmful. The only ones who benefit are the anonymous owners of these illegal services. Authors and publishers see no return on their efforts and investments," BREIN comments.

"Copyright holders deserve an honest living. There are numerous legal ways to obtain ebooks. If desired, this can also be done very cheaply; through the library for example."

Dynamic Order

The Rotterdam court issued a so-called 'dynamic' blocking order, meaning that rightsholders can update the targeted domains and IP addresses if the sites switch to new ones in the future. This also applies to mirrors and increases the blockades' effectiveness, as there is no need to return to court.

Previously, Internet provider KPN challenged these 'dynamic' orders, suggesting that they are too broad. The court rejected this argument, however, noting that the process hasn't led to any major problems thus far.

BREIN further reports that Google is voluntarily offering a helping hand. As reported in detail previously, the search engine removes blocked domains from its local search results after being notified about an ISP blocking order.

"The effectiveness of the blocking measure is increased because Google cooperates in combating these infringements and, at the request of BREIN, completely removes all references to websites that are blocked by order of the Dutch court from the search results," BREIN writes.

Elephant in the Room

The blockade of the two shadow libraries is a key victory for BREIN; Anna's Archive and LibGen are the largest sites of their kind along with a similar platform, Z-Library. Interestingly, however, the latter is not part of this blocking order.

Z-Library is the target of an ongoing criminal investigation by the U.S. Government, an enforcement effort in which BREIN also played a role. It is not clear why the site isn't part of the blocking request, however.

This 'omission' is notable considering the anti-piracy group's earlier stance. After Z-Library's initial shutdown, BREIN explicitly warned that it would obtain a court order to block Z-Library if it came back online.

Instead of going after Z-Library, BREIN's latest blocking request targets two other shadow libraries. BREIN must have its reasons not to include Z-Library in this legal effort but the group didn't immediately respond to our request for clarification.

Update: After publication BREIN explained that it focused on these two domains as they are seen as more popular than Z-Library. Z-Library is targeted by the U.S. but BREIN is

planning to request a blockade in the future if the site stays online.


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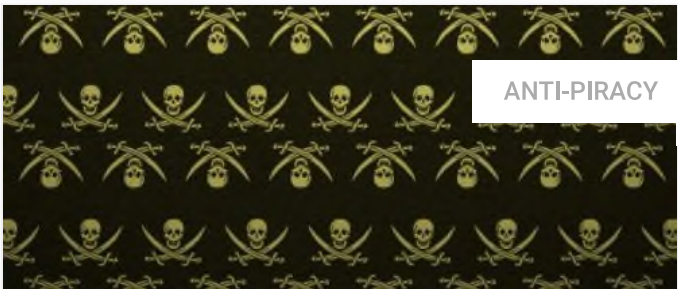
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June 7, 2024, 09:19 by Ernesto Van der Sar



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April 27, 2024, 14:16 by Ernesto Van der Sar



LAWSUITS

Key Defendant in Anna's Archive Lawsuit Denies Any Involvement With the Site

April 16, 2024, 11:39 by Ernesto Van der Sar



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